

JGW/2011R00545

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**BARRY H. LANDAU and
JASON JAMES SAVEDOFF,
a/k/a Jason James
a/k/a Justin Ward**

Defendants.

CRIMINAL NO. CCB-11-0415
**(Conspiracy to Commit Theft of Major
Artwork, 18 U.S.C. § 371; Theft of
Major Artwork, 18 U.S.C. § 668)**

INDICTMENT

COUNT ONE

(Conspiracy to Commit Theft of Major Art)

The Grand Jury for the District of Maryland charges that:

At all times material to this Indictment:

1. **BARRY H. LANDAU** is a citizen of the United States and resident of the city and state of New York.
2. **JASON JAMES SAVEDOFF** is a citizen of Canada and the United States and resident of the city and state of New York. He has utilized the identities Jason James and Justin Ward.
3. A "museum," as defined in 18 U.S.C. § 668, is an organized and permanent institution, the activities of which affect interstate and foreign commerce, that is situated in the United States, is established for an essentially educational and aesthetic purpose, has a professional staff, and owns, utilizes, and cares for tangible objects that are exhibited to the public on a regular schedule.

4. The H. Furlong Baldwin Library at the Maryland Historical Society and the New York Historical Society are not-for-profit institutions which are, among other things, repositories for historical and cultural objects, to include books, manuscripts, letters and other objects of cultural heritage, and are "museums" as defined in 18 U.S.C. § 668.

5. An "object of cultural heritage," as defined in 18 U.S.C. § 668, is an object that is either over 100 years old and worth in excess of \$5,000 or that is less than 100 years old and worth at least \$100,000.

6. A "reading copy," as the term is used herein, is the copy of a presidential address from which a President of the United States read, and which he signed or initialed, together with his handwritten corrections and additions.

7. The United States National Archives and Records Administration (hereinafter National Archives) is an agency of the United States charged with preserving and documenting government and historical records. The National Archives maintains facilities and exhibitions in Washington, D.C. and College Park, Maryland. It also maintains regional facilities located throughout the United States, including Presidential libraries and public-private partnerships.

8. The Office of Presidential Libraries, a component of the National Archives, is located in College Park, Maryland, and administers a nationwide network which consists of thirteen Presidential Libraries, beginning with the 31st President of the United States, Herbert Hoover. These Presidential Libraries are repositories for preserving and making accessible the papers, records, and other historical materials of U.S. Presidents.

9. The Franklin D. Roosevelt Presidential Library and Museum is located in Hyde Park, New York. It is a repository of documents and objects from the Presidency of Franklin D. Roosevelt. Included in its collections are "reading copies" of speeches given by President

Roosevelt, and signed by him. The Franklin D. Roosevelt Presidential Library and Museum is a "museum" as defined in 18 U.S.C. § 668.

10. From in or about December 2010 and continuing through July 2011, in the District of Maryland, the Southern and Northern Districts of New York, the District of Connecticut, and the Eastern District of Pennsylvania, and elsewhere, the defendants,

**BARRY H. LANDAU and
JASON JAMES SAVEDOFF,**

did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree with each other, and with others known and unknown to the Grand Jury, to commit an offense against the United States, and any agency thereof, that is, to steal and obtain by fraud from the care, custody, and control of various museums certain objects of cultural heritage, as set forth below and in violation of Title 18, United States Code, Section 668.

MANNER and MEANS and PURPOSE of the CONSPIRACY

11. It was part of the conspiracy that **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** conducted research in order to locate collections which contained valuable documents and manuscripts, many of which constituted objects of cultural heritage.

12. It was part of the conspiracy that **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** prepared lists containing the names of historical figures and other noteworthy individuals, and made notations referencing the value of signatures and documents authored or signed by the listed individuals.

13. It was part of the conspiracy that **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** visited museums and other repositories and accessed collections of objects of cultural heritage, and that **LANDAU** and **SAVEDOFF** stole objects of cultural heritage from the

collections, which they subsequently sold or intended to sell.

14. It was part of the conspiracy that **BARRY H. LANDAU** contacted purchasers and re-sellers of historical documents, manuscripts, and objects of cultural heritage in order to sell the items he stole and that were stolen by **JASON JAMES SAVEDOFF** for their financial gain.

OVERT ACTS

15. In furtherance of the conspiracy and in order to effect the object thereof, one or more of the conspirators committed and caused to be committed the following overt acts, among numerous others, in the District of Maryland and elsewhere:

a. On or about December 2, 2010, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF**, who used the alias Jason James, visited the Franklin D. Roosevelt Presidential Library and Museum and accessed numerous boxes of documents which contained speeches given by Franklin D. Roosevelt and other writings of President Roosevelt and Henry Morgenthau, the Secretary of the Treasury under President Roosevelt.

b. On or about December 2, 2010, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** stole and removed from the Franklin D. Roosevelt Presidential Library and Museum a number of historical documents, including seven "reading copies" of speeches given by President Roosevelt.

c. On or about December 20, 2010, **BARRY H. LANDAU** sold four stolen "reading copies" of addresses given by Presidential Roosevelt to an individual for the sum of \$35,000.

d. On or about March 17, 2011, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF**, who used the alias Justin Ward, visited the New York Historical Society in New York City and accessed numerous boxes of documents which contained, among other things,

objects of cultural heritage.

e. On or about March 17, 2011, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF**, stole and removed from the New York Historical Society an object of cultural heritage, specifically, a letter dated April 1, 1780 from Benjamin Franklin to John Paul Jones.

f. On or about July 9, 2011, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** visited the H. Furlong Baldwin Library at the Maryland Historical Society and accessed numerous boxes of documents which contained, among other things, objects of cultural heritage.

g. On or about July 9, 2011, **BARRY H. LANDAU** and **JASON JAMES SAVEDOFF** stole and removed from the H. Furlong Baldwin Library at the Maryland Historical Society approximately sixty documents which were in the care, custody and control of said museum, including a number of documents that are objects of cultural heritage.

18 U.S.C. § 371

18 U.S.C. § 668

COUNT TWO
(Theft of Major Artwork)

The Grand Jury for the District of Maryland further charges that:

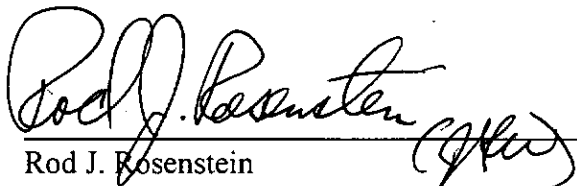
1. The allegations contained in Paragraphs 1 through 9 of this Indictment are incorporated here.

2. On or about July 9, 2011, in the District of Maryland, the defendants,

**BARRY H. LANDAU and
JASON JAMES SAVEDOFF,**

did steal and obtain by fraud from the care, custody, and control of a museum objects of cultural heritage; that is, the defendants stole from the H. Furlong Baldwin Library at the Maryland Historical Society numerous objects of cultural heritage, including a land grant dated June 1, 1861 to John Lorn, Private Captain, Hannberts Company, Maryland Militia, War of 1812, and signed by President Abraham Lincoln.

18 U.S.C. § 668


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

For person

7/28/11
Date